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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

GARY WHEELOCK, *Plaintiff*, v. UNITED STATES OF AMERICA *Defendant*.	Civil No. 07cv 2177 - JM (JMA) **JOINT MOTION TO RE-SET THE PRE-TRIAL SCHEDULE** Hon. Jan M. Adler

The parties have meet and conferred pursuant to the Court's order of August 7, 2008. The parties have considered the unexpected issues and complexity, as well as the other practical and legal aspects of the case and they jointly propose the following new schedule for this case.

Event	Current Dates	Proposed New Dates
Plaintiff Designates Experts	August 22, 2008	October 3, 2008

Event	Current Dates	Proposed New Dates
Defendant Designates Experts	August 22, 2008	October 3, 2008
Supplemental Expert Designations	September 5, 2008	October 24, 2008
Voluntary Settlement Conference	Not scheduled	On or after November 24, 2008
Plaintiff's Expert Reports are due	September 19, 2008	January 16, 2009
Defendant's Expert Reports are due	October 17, 2008	February 13, 2009
Last Day to Supplement Expert Reports	November 14, 2008	March 13, 2009
Briefs for Mandatory Settlement Conference	May 6, 2009	On or after June 8, 2009
Mandatory Settlement Conference	May 13, 2009	On or after June 15, 2009
All Factual and Expert Discovery Completed	January 23, 2009	May 8, 2009
Deadline for Motions to be Filed	February 20, 2009	May 25, 2009
Memorandum of Contentions of Fact and Law, to be filed (if required)	Waived	Waived
Final Pre-trial Disclosures, Rule 26(a)(3)	June 5, 2009	On or after July 24, 2009
Objections to Pre-trial Disclosures	June 19, 2009	On or after August 7, 2009
Comply with L. R. 16.1.f.4: Plaintiff tenders proposed Pre-trial Conf. Order; Exchange Exhibits; craft stipulations, etc., not later than	June 12, 2009	On or after August 14, 2009

Event	Current Dates	Proposed New Dates
Parties lodge Proposed Pre-trial Conference Order with Court	June 19, 2009	On or after August 17, 2009
Pre-trial Conference before District Judge	June 26, 2009	On or after August 24, 2009
Trial	July 27, 2009	On or after September 21, 2009

The Court is asked to approve the proposed schedule as set out above.

A draft proposed order will be concurrently sent to Magistrate Judge Adler's chambers.

Respectfully submitted,

August 26, 2008

KAREN P. HEWITT
United States Attorney

/s/ ***Thomas B. Reeve, Jr.***

THOMAS B. REEVE, JR.
Assistant U.S. Attorney
Attorneys For Defendant

August 26, 2008

Law Office of Kathryn P. Cooney

/s/ ***Kathryn P. Cooney***

KATHRYN P. COONEY
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